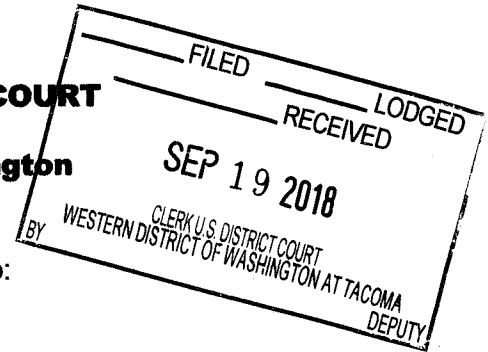


**UNITED STATES DISTRICT COURT**  
**Western District of Washington**



In re:  
HACKETT LAW FIRM, LLC;  
HACKETT, RYAN;  
ZOOK, ROSEMARY;  
STEGEMEIER, PAULA  
Defendants

COERS MITCHELL LAW LLC  
2100 NE Broadway, Suite 105  
Portland, OR 97232

RONALD A. OWEN  
347 Dora Ave.  
Bremerton, WA 98312  
360-265-2405 (modelshop@hushmail.com)  
Plaintiff/Creditor

) Case No:

**C18 5760**

) MALPRACTICE  
) COMPLAINT  
) FOR FRAUD

Comes now Plaintiff, Ronald Owen, and files his complaint against HACKETT LAW FIRM, LLC ("Hackett LLC") of Vancouver, WA and individual defendants as listed to hold legally accountable for actions under Title 18, U.S.C.

**INTRODUCTION**

1) This court has diversity jurisdiction pursuant to 28 U.S.C. § 1332 et al, regarding a series of overtly fraudulent and deceptive practices by Hackett LLC in related proceedings on behalf of third-party Debtor(s)/Defendant(s) in the United States Bankruptcy Court, District of Oregon (Portland)<sup>1</sup>.

2) These false acts herald a culture of affirmative misconduct by Hackett LLC: Counsel Ryan Hackett ("Counsel"), Rosemary Zook ("Barrister"), and Legal Assistant Paula Stegemeier ("Legal Assistant").

3) Plaintiff has filed a separate Adversary Proceeding<sup>2</sup>, in which a *de facto* corporation<sup>3</sup> between related third parties is utilized to shield assets. The parties consist of JENNIFER ANN MCCAOW ("Jen McCaw"), her husband ALAN MCCAOW and THOMAS O. REGAN, (SSN: xxx-xx-8753/DOB: xx-xx-1964).

<sup>1</sup> mover case no. 18-30916-dwh7; <sup>2</sup> adversary case number 18-03057-dwh; <sup>3</sup> *Tres faciunt collegium*; "three form a corporation" / Black's Law, 8<sup>th</sup> Ed.

TAC 015333 - no summons issued / received

(2)

4) Hackett LLC represents Jen McCaw in both primary and Adversary Proceedings. Neither two of the other third party members is represented.

**Filing practices by Hackett LLC:**

5) Explicit or intimated instruction to Jen McCaw that preference recoveries in the amount of \$727.09 would be recaptured to offset an installment payment obligation to Hackett LLC;

6) Tampering with and made false statements on official Form 106 A/B (exhibit 'B').

**Recapture practices by Hackett LLC:**

7) From March 19, 2018 to May 25, 2018, Hackett LLC individual defendants engaged Plaintiff repeatedly for the return of \$723.09 (727.09). Tactics included:

- a) Barrister demand for funds under threat of litigation (exhibit 'C');
- b) Legal Assistant demand for funds (exhibit 'D');
- c) Barrister admitting fraudulent practice (exhibit 'E');
- d) Barrister reverting to litigation threat after Creditor objected under statute (exhibit 'F').

**Discovery practices by Hackett LLC:**

8) Barrister granted consent to disclose<sup>3</sup> all matters, including sealed financial documents<sup>4</sup> revealed by Jen regarding Regan (exhibit 'G');

9) Barrister issued final denial of document possession on May 25, 2018 (exhibit 'H').

**Thereafter the Plaintiff asserts:**

10) Creditor queried online personal registries and discovered corroborating evidence contradicting counsel claims (see exhibit 'J');

11) Creditor challenged Counsel, lastly on June 15, 2018;

12) Barrister avoided comment on discovery allegations placed at a July 31, 2018 pre-trial conference<sup>4</sup>.

---

<sup>3</sup> Rule 2004; (discovery pursuant to Fed R. Bankr. P. 7026-1(a)(2)); <sup>4</sup> "avoid unnecessary proof", FRCP 16(c)(2)(C).

(3)

**As a result of multiplied efforts, the Plaintiff asserts:**

- 13) Delay filing timely objection to discharge<sup>1</sup> under 11 U.S.C. §727;
- 14) Discharge order on August 2, 2018;
- 15) Sanction motion pending on jurisdiction.

**As defined under 18 U.S.C. §151, the Plaintiff charges against Hackett LLC individual defendants:**

- 16) Fixing the fees under 18 U.S.C. §155;
- 17) Form tampering under 18 U.S.C. §1519;
- 18) Falsified statements under 18 U.S.C. §1001(a);
- 19) Concealment of assets under 18 U.S.C. §152(1);
- 20) Bankruptcy fraud under 18 U.S.C. § 157, et al.

**Under 18 U.S.C. §3284, the concealment of assets in bankruptcy is an ongoing issue.** These deliberate acts do not vitiate any rights or remedies.

Plaintiff demands compensatory and punitive damages in the amount of 250,000 USD from Hackett LLC. Plaintiff reserves the right to seek compensatory and punitive damages from individual defendants.



Plaintiff

19 Sept. 2018  
Date

---

<sup>1</sup> Fed R. Bankr. P. 4004(a).

## Plaintiff exhibit 'B'

Debtor 1 Jennifer Ann McCaw

Case number (if known) \_\_\_\_\_

## 31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund  
value:

## 32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☒ No☐ Yes. Give specific information..

## 33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☐ No☒ Yes. Describe each claim.....Potential counter-claim against Ronald Owen for  
fraud/improper collection on judgment against Ms. McCaw's  
estranged husband

Unknown

## 34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☒ No☐ Yes. Describe each claim.....

## 35. Any financial assets you did not already list

☐ No☒ Yes. Give specific information..

Estimated wages owed at time of filing

\$1,340.00

Preference Recovery Payment: Ronald Owen vs. Alan McCaw  
& Jennifer Ann McCaw  
Case No: 17CV05870

\$727.09

## 36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$35,822.12

**Part 5** Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

## 37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.☐ Yes. Go to line 38.**Part 6** Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.  
If you own or have an interest in farmland, list it in Part 1.

## 46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.☐ Yes. Go to line 47.**Part 7** Describe All Property You Own or Have an Interest In That You Did Not List Above

Plaintiff exhibit 'C'

**HACKETT LAW FIRM LLC**

*Attorneys At Law*

*1500 NW Bethany Blvd. Suite 288*

*Beaverton, OR 97006*

*PH: 503-352-3690 FAX: 503-601-0469*

*www.pacificbankruptcy.com*

Ryan P. Hackett\*

Rosemary E. Zook

\*Licensed in Oregon & Washington

March 19, 2018

**Ronald Owen  
347 Dora Ave  
Bremerton, WA 98312**

**RE: Ronald Owen. vs. Alan McCaw & Jennifer McCaw  
Case No:17CV05870  
Wage Garnishment & Bankruptcy Filing**

Dear Mr. Owen,

I represent **Jennifer Ann McCaw** in a pending Chapter 7 case filed in the District of Oregon (case number **18-30916-dwh7**). The chapter 7 case was filed on **March 16, 2018**.

Our records indicate that you received funds from a wage garnishment that totaled **\$723.09** in the 90 days before the bankruptcy case was filed.

The funds received were within the preference period and are recoverable by the Debtor. The preference payment is disclosed in Schedule B of the bankruptcy filing and fully exempted in schedule C. Therefore, the Debtor is entitled to pursue the preference and we request that the amount of **\$723.09** is returned by you to our office in care of "**Trust Account of Jennifer Ann McCaw**" with 10 days of receiving this letter.

If our office fails to receive the funds within 10 days we will pursue the garnished funds by filing an Adversary Proceeding in this case, which may result in additional costs to you of attorney fees and costs.

If you have any questions or concerns regarding this, please contact me by phone, email or letter.

Sincerely,

/s/ Rosemary Zook

Rosemary Zook  
Attorney at Law

## Plaintiff exhibit 'D'

arrive by Monday.

Kind regards,

Ron

Sent using Hushmail

On 4/3/2018 at 2:30 PM, "Paula Stegemeyer" <[paula@hhlawsite.com](mailto:paula@hhlawsite.com)> wrote:

> Mr. Owen,

> On 3/19/18 our office mailed you the attached letter requesting funds  
> to be issued back to our client Ms. McCaw. Our records indicate that you  
> received funds from a wage garnishment that totaled \$723.09 in the 90  
> days before the bankruptcy case was filed. The funds received were  
> within the preference period and are recoverable by the debtor.

> Please let me know the status of returning these funds per the  
> instructions on the letter.

> Sincerely,

> Paula Stegemeyer

> Legal Assistant

> Hackett Law Firm, LLC

> Beaverton | Portland | Vancouver, WA

> Main Office: 1500 NW Bethany Blvd. Suite #288 Beaverton, OR 97006

> Oregon 503-352-3690 Washington 360-213-2722 Fax: 503-601-0469

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← Previous 63 of 179 Next →



Report spam

Delete

Move

Mark unread

Forward

Reply all

Reply

← Back to inbox

View as: Mobile | Desktop

## Plaintiff exhibit 'E'

**RE: FW: McCaw, Case No: 18-30916-dwh7 Preference Recovery Status**  
 Rosemary Zook to modelshop (123 days ago) [show details](#) [create a rule](#)

Back to inbox Reply Reply all Forward Mark unread Move Delete Report spam

Previous 51 of 179 Next

Mr. Owen,

I think you are referring to the potential claim against you that was listed on Schedule B. We are required to list all potential assets in a bankruptcy case, which is why this was disclosed. Had Ms. McCaw failed to disclose this potential claim, she could have been denied a bankruptcy discharge. Ms. McCaw has no intention of pursuing this potential claim against you and harbors no ill will. We were merely complying with the rules for case preparation. She is hopeful that you will be able to recover the amounts owed to you from the other parties.

If you prefer not to attend tomorrow's hearing, I am happy to mail the car title back to you via certified mail, and you can mail the check to us representing return of the funds garnished prior to Ms. McCaw's case being filed.

Please let me know if you have any other questions or concerns.

Thank you.

Rosemary Zook  
 Attorney at Law  
 Hackett Law Firm, LLC  
 Beaverton | Portland | Vancouver, WA  
 Main Office: 1500 NW Beithany Blvd Suite #288 Beaverton, OR 97005  
 Oregon : 503-352-3690 Washington : 360-213-2722 [www.pacificbankruptcy.com](http://www.pacificbankruptcy.com)

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-----Original Message-----  
 From: modelshop@hushmail.com [mailto:modelshop@hushmail.com]  
 Sent: Wednesday, April 18, 2018 11:17 AM  
 To: Rosemary Zook <rzook@hnlawsite.com>  
 Subject: RE: FW: McCaw, Case No: 18-30916-dwh7 Preference Recovery Status

Rosemary,

There is an insertion of dictum between lines 35/36 on form 106 A/B. Remove this stipulation immediately.

Please bring both insurance documents as they are germane to Claim 4.6.

Thank you.

Ron

**Manage folders**

**Inbox**  
 Sent  
 Drafts  
 Junk  
 Trash  
 Match



## Plaintiff exhibit 'F'

**Hushmail**

Search this folder  Previous 42 of 179 Next

Back to inbox Reply Reply all Forward Mark unread Move Delete Report spam

FW: FW: McCaw, Case No: 18-30916-dwh7 Preference Recovery Status

Rosemary Zook to modelshop (109 days ago) show details create a rule

Mr. Owen,

I am following up on our demand for a return of garnished funds. Please let me know when you intend to tender payment. Since you continue to delay payment, I am in the process of drafting a complaint to file with the bankruptcy court and we will be seeking attorney fees.

Sincerely,

Rosemary Zook  
Attorney at Law  
Hackett Law Firm, LLC  
Beaverton | Portland | Vancouver, WA  
Main Office: 1500 NW Bethany Blvd, Suite #288 Beaverton, OR 97006  
Oregon : 503-352-3690 Washington : 360-213-2722 503-601-0469  
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-----Original Message-----  
From: Rosemary Zook  
Sent: Monday April 23, 2018 9:38 AM  
To: 'modelshop@hushmail.com' <modelshop@hushmail.com>  
Subject: RE: FW: McCaw, Case No: 18-30916-dwh7 Preference Recovery Status

Mr. Owen,

A garnishment does not represent ordinary business dealings. Since you do not appear to be complying with my written request for return of funds, I am drafting a complaint to file with the bankruptcy court. Once we prevail on this proceeding, I will be able to request the court to enter a judgment in our favor for the garnished funds, plus attorney fees and court costs. I suggest again, that you seek legal advice.

Sincerely,

Rosemary Zook  
Attorney at Law  
Hackett Law Firm, LLC  
Beaverton | Portland | Vancouver, WA  
Main Office: 1500 NW Bethany Blvd, Suite #288 Beaverton, OR 97006 Oregon : 503-352-3690 Washington : 360-213-2722 503-601-0469 [www.pacificbankruptcy.com](http://www.pacificbankruptcy.com)

Manage folders

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Drafts  
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Trash  
Watch



Plaintiff exhibit 'G'

-----Original Message-----  
From: Rosemary Zook  
Sent: Wednesday, May 02, 2018 11:57 AM  
To: 'modelshop@hushmail.com' <modelshop@hushmail.com>  
Subject: RE: FW: McCaw Case No: 18-30916-dwh7 Preference Recovery Status

Mr. Owen,

I have not received anything from you and cannot tell you what you need to do procedurally. As soon as I got your email below, though, I reached out to Jennifer to see what documents she has possession of so we can avoid you having to take additional steps. As I have mentioned in the past, she is more than willing to assist you with anything you need to pursue the other parties so it should not be necessary for you to request a 2004 examination. I will be in touch as soon as I have more information for you.

Thank you.

Rosemary Zook  
Attorney at Law  
Hackett Law Firm, LLC  
Beaverton | Portland | Vancouver, WA  
Main Office: 1500 NW Bethany Blvd. Suite #288 Beaverton, OR 97006 Oregon : 503-352-3690 Washington : 360-213-2722 [info@hackett-law.com](mailto:info@hackett-law.com) [www.pacificbankruptcy.com](http://www.pacificbankruptcy.com)

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-----Original Message-----  
From: modelshop@hushmail.com [mailto:modelshop@hushmail.com]  
Sent: Wednesday, May 02, 2018 11:52 AM  
To: Rosemary Zook <rzook@hhlawrite.com>  
Subject: Re: FW: McCaw Case No: 18-30916-dwh7 Preference Recovery Status

Rosemary,

I had the opportunity to speak with Amy on Monday and she suggested a 2004 filing to subpoena Jennifer to produce the insurance/financial letters she possesses on Tom Regan.

Insofar as our legal opinions differ on Title 11, section 522, section 523 specifically restricts exemptions on funds derived through fraud, especially fiduciary.

The extent of the estate transcends the scope of discovery, previously alloted.

I mailed a discovery packet to you several weeks back, this pertains to the tax haven scams, internationally. Amy was also mailed one.

Do you know if I need to file a proof of service with the bankruptcy court for the 2004 filing?

Ron

## Plaintiff exhibit 'H'

Sent  
 Drafts  
 Junk  
 Trash  
 Mailbox

Manage folders

Back to top |
 Reply |
 Forward |
 Mark unread |
 Move |
 Delete |
 Report spam

RE: Jennifer McCaw

Rosemary Zook to modelshop (86 days ago) show details create a rule

Mr. Owen,

Ms. McCaw does not know what you are talking about and does not have anything in her glove box. Can you please be more specific about what you are looking for?

I do not have access to Alan's personal information- he is not my client.

Ms. McCaw has not initiated formal divorce proceedings at this point so there is no case number.

Sincerely,

Rosemary Zook

Attorney at Law

Hackett Law Firm, LLC

Beaverton | Portland | Vancouver, WA

Main Office: 1500 NW Bethany Blvd, Suite #288 Beaverton, OR 97006

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-----Original Message-----

From: modelshop@hushmail.com [mailto:modelshop@hushmail.com]

Sent: Friday, May 25, 2018 12:15 PM

To: Rosemary Zook <zook@hthawrite.com>

Subject: Re: Jennifer McCaw

Rosemary,

I still haven't heard back regarding my information requests. At this time, I've completed the forms (w/citations) to continue without the immediate need for Jen's insurance envelopes (helpful but not required).

This adversarial complaint is substantially complete, but having Alan's SSN would be helpful (and save me \$50). Also, I will need the case number for Jen's divorce.

Expect to receive a proof-of-service notice in the mail shortly.

Kind regards,

Ron

Sent using Hushmail

## Plaintiff exhibit 'J'

PERSON		REVERSE PHONE	REVERSE ADDRESS	EMAIL	My Dashboard
e.g. Genesis P. O'Grady			City, State	fi	
<div> <div> <p>EXTENDED FAMILY</p> <p>Betty M Regan</p> <p>Beverly P Regan</p> <p>Brandon T Regan</p> <p>James C Regan</p> <p>Janet Elaine Regan</p> <p>DETAILS</p> </div> <div> <p>3 More Extended Family Members</p> <p>29 More People Linked By Address</p> <p>67 More People Linked By Business transaction</p> </div> </div>					
<div> <div> <p>ADDRESS &amp; PROPERTY HISTORY</p> <p>SEPTEMBER 2014 - JUNE 2018</p> <p>7960 Sw. Abelia Pl</p> <p>Beaverton, OR 97008</p> <p>JUNE 2011 - MARCH 2018</p> <p>4931 Sw 76th Ave</p> <p>Portland, OR 97225</p> <p>MAY 1996 - FEBRUARY 2017</p> <p>8885 Sw Canyon Rd Ste 119</p> <p>Portland, OR 97225</p> <p>MARCH 2014 - MAY 2014</p> <p>Po Box 6823</p> <p>Boise, ID 83707</p> <p>DECEMBER 2006 - MARCH 2014</p> <p>17874 Tamara Ct</p> <p>Lake Oswego, OR 97035</p> <p>DETAILS</p> </div> <div> <p>4 Residences in the Last 10 Years</p> <p>Owned 3 Properties</p> <p>2 Evictions in 14 Years</p> <p>13 More Addresses</p> </div> </div>					
<div> <div> <p>CRIMINAL, LEGAL &amp; FINANCIAL HISTORY</p> <p>Legal or financial issues in the past</p> </div> <div> <p>6 Gally Records</p> </div> </div>					